

# **Exhibit A**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

The State of Texas, *et. al.*,

Plaintiffs,

v.

Google LLC,

Defendant.

Case No. 4:20-CV-957-SDJ

Hon. Sean D. Jordan

**DECLARATION OF ERIC PETERSON**

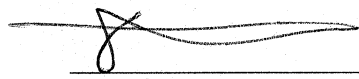
I, Eric Peterson, declare based on personal knowledge as follows:

1. I am an investigator at the Office of the Attorney General for the State of Texas (“OAG”).
2. This declaration is provided in support of Plaintiffs’ Opposition to Google’s Motion to Transfer Venue. I have personal knowledge of the facts stated herein, and if called as a witness, I could and would testify competently thereto.
3. The OAG began investigating Google’s anticompetitive conduct in July of 2019. As part of the OAG’s investigation and before the filing of this lawsuit, approximately 3 million documents were produced and 64 third-party witnesses were interviewed or submitted documents in response to a Civil Investigative Demand. 34 of these third-party witnesses have headquarters that are closer to the Eastern District of Texas than the Northern District of California.
4. Attached hereto as Exhibit A-1 is a list of publishers and advertisers that employ potential third-party witnesses in this case and are located within 100 miles of the Court. These third

parties were identified by OAG staff after evaluating public lists of publishers and large advertisers in Dallas, Fort Worth and surrounding counties and determining which entities likely sold or purchased display and/or video ads from Google. For advertisers, OAG staff researched publicly available data about the company, including its business model and web presence. For publishers, OAG staff examined the publishers' site for Google display ads, reviewed the webpage source code, and/or reviewed the site's ads.txt file if available. These publishers and advertisers likely have relevant and material information about Google's advertising business and could be subpoenaed for trial at this Court.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on 2/1/21, in Austin TX.  
(date) (location)

  
(Signature)